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7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 ROBERT ERTMAN,

15 Defendant.  
16  
17  
18

Case No. 1:24-mj-00115-HBK

STIPULATION TO MODIFY CONDITION OF  
PRETRIAL RELEASE; ORDER

19 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
20 counsel, Assistant United States Attorney Arin Heinz, counsel for plaintiff, and Assistant Federal  
21 Defender Reed Grantham, counsel for defendant Robert Ertman, that the Court modify a  
22 condition of Mr. Ertman's pretrial release initially imposed on October 4, 2024. *See* Dkt. #4, #7.  
23 Specifically, the parties stipulate that Condition (7)(o) of Mr. Ertman's conditions of pretrial  
24 release be modified in accordance with the below.

25 Condition (7)(o) provides that Mr. Ertman: "[S]urrender [his] passport to the Clerk,  
26 United States District Court within five business days of your release from custody, and you  
27 must not apply for or obtain a passport or any other travel documents during the pendency of this  
28 case." Mr. Ertman was released from the Fresno County Jail on October 8, 2024, and was

1 immediately and directly transported to WestCare to begin a 90-day residential treatment  
2 program. Mr. Ertman is currently residing at the WestCare program in Fresno. Mr. Ertman's U.S.  
3 passport is currently at his residence in Denver, Colorado, and he is unable to access it while  
4 residing at WestCare.

5 In light of the above, the parties agree to modify Condition (7)(o) as follows: "surrender  
6 your passport to the Pretrial Services Office in the District of Colorado within five business days  
7 of your return to your district of residency, and you must not apply for or obtain a passport or  
8 any other travel documents during the pendency of this case."

9 All other terms and conditions of Mr. Ertman's pretrial release, previously imposed, shall  
10 remain in full force and effect.

11 Respectfully submitted,

12 PHILLIP A. TALBERT  
13 United States Attorney

14 Dated: October 9, 2024

/s/ Arin Heinz  
15 ARIN HEINZ  
16 Assistant United States Attorney  
Attorney for Plaintiff

17 HEATHER E. WILLIAMS  
18 Federal Defender

19 Date: October 9, 2024

/s/ Reed Grantham  
20 REED GRANTHAM  
21 Assistant Federal Defender  
Attorney for Defendant  
ROBERT ERTMAN

**ORDER**

IT IS SO ORDERED. The above term and condition of Mr. Ertman's pretrial release, previously imposed on October 4, 2024, is hereby modified as set forth above. All other conditions previously imposed remain in full force and effect.

IT IS SO ORDERED.

Dated: **October 10, 2024**

/s/ Eric P. Grogan  
UNITED STATES MAGISTRATE JUDGE